STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCIAL REGULATION

In the Matter of:

ANSSI VILJANEN, an Individual, and IRONSIDE CLAIMS LLC, a California Limited Liability Company,

Respondents.

Case No. INS-25-0052

FINAL ORDER TO CEASE AND DESIST, FINAL ORDER TO REVOKE LICENSE, FINAL ORDER TO PERMANENTLY REFRAIN FROM APPLYING FOR LICENSURE, FINAL ORDER TO ASSESS CIVIL PENALTIES, AND CONSENT TO ENTRY OF ORDER

THIS IS A FINAL ORDER

The Director of the Department of Consumer and Business Services for the State of Oregon (“Director”), acting in accordance with Oregon Revised Statutes (“ORS”) chapters 731, 732, 733, 734, 735, 737, 742, 743, 743A, 743B, 744, 746, 748 and 750 (“Insurance Code”), has conducted an investigation into the insurance related activities of Anssi Viljanen (“Viljanen”) and Ironside Claims LLC (“Ironside”) (collectively, “Respondents”) and determined that Respondents engaged in activities constituting violations of the Insurance Code.

Respondents, without admitting or denying the Director’s Findings of Fact or Conclusions of Law, wish to resolve and settle this matter with the Director.

Now, therefore, as evidenced by the authorized signatures subscribed on this Order, Respondents hereby CONSENT to entry of this Order upon the Director’s Findings of Fact and Conclusions of Law as stated hereinafter.

FINDINGS OF FACT

The Director FINDS that:

1. On April 11, 2024, Viljanen was issued an Oregon insurance adjuster license. His National Producer Number (“NPN”) is 18730294.

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2. Viljanen is Ironside's sole member and manager. At all relevant times, Viljanen acted on Ironside's behalf and controlled and directed all actions of Ironside. Viljanen, through that status as the sole member and manager, caused Ironside to take or fail to take each action or failure to act of Ironside identified in this *Order to Cease and Desist, Proposed Order to Revoke License, Proposed Order to Assess Civil Penalties, and Notice of Right to an Administrative Hearing*.

3. Ironside's principal place of business is 1165 Valley View Avenue, Pasadena, CA 91104.

4. From in or around February 2024 through in or around March 2024, Respondents sent or assigned their representatives to solicit Oregon residents to permit Ironside to represent them in negotiating and settling 1st and 3rd party homeowners insurance claims for wildfire-related damages.

5. Respondents contracted with 62 Oregon residents (the "Oregon Clients") to provide the foregoing services in exchange for compensation.

6. Respondents filed 42 insurance claims on behalf of the Oregon Clients to address smoke- and ash-related damages purportedly caused by wildfires.

<u>Failure to Respond to Director's Inquiries</u>

7. Viljanen provided the Director with a spreadsheet containing information about the Oregon Clients, the representatives who met with them, and the insurance claims Respondents filed on their behalf.

8. On or around January 16, 2025, the Director directed additional inquiries to Viljanen concerning the spreadsheet data and Respondents' Oregon activities. Responses were due January 30, 2025.

9. On or around February 5, 2025, the Director re-submitted the inquiries to Viljanen after receiving no response.

10. On or around February 19, 2025, the Director re-submitted the inquiries to

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Viljanen after receiving no response.

11. Viljanen did not respond to the Director's January 16, 2025 inquiries until September 24, 2025.

Misconduct in Connection with Adjuster Activity

12. The Director's investigation of the insurance claims filed by Respondents revealed a pattern of incompetence or untrustworthiness. In particular:

A. Numerous Oregon Clients stated that insurance claims were filed without their knowledge and/or for properties that had incurred no damage;

B. Respondents repeatedly withdrew claims after the insurance carrier requested sworn statements to support them;

C. Of the 17 claims for which the Director obtained information, none were approved. 13 were withdrawn, two were denied following inspections that found no property damage, and two were closed due to an inability to contact the insured;

D. Viljanen pre-signed each of the Oregon Clients' contracts without having met any of them; and

E. Upon information and belief, Respondents' representatives falsely identified themselves to the Oregon Clients and insurance carriers.

JR

13. The representative who contracted with Oregon Client "JR" was said to have identified himself as "Norman Madrid" ("Madrid"). Respondents' spreadsheet identified the representative as "Diego Delgadillo" ("Delgadillo"). JR's contract bore Viljanen's signature.

14. JR later identified the representative via a digital business card as "Frederick Bryant" (Bryant"). Bryant acted as an adjuster on Respondents' behalf.

15. JR stated that Bryant pressured her to file a claim despite there being no damage to her property. JR ultimately withdrew the claim.

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SJ

16. The representative who contracted with Oregon Client "SJ" was said to have identified himself as Madrid. Respondents' spreadsheet identified the representative as Delgadillo. SJ's contract bore Viljanen's signature.

17. SJ's claim was assigned to Farmers Insurance ("Farmers") Special Investigations Unit because of the extensive delay in reporting,[1] the large distance between the property and the wildfire,[2] SJ's unawareness that the claim was filed and the adjuster, identified as Madrid, advising Farmers not to speak to SJ.

18. Following an inspection in which no damage was found by Farmers, SJ's claim was denied.[3]

GJ

19. Respondents identified the representative who contracted with Oregon Client "GJ" as Delgadillo. GJ's contract bore Viljanen's signature.

20. GJ stated he felt coerced into contracting with Respondents and denied that his property had been damaged. GJ ultimately withdrew his claim.

PZ

21. Respondents identified the representative who contracted with Oregon Client "PZ" as Delgadillo. PZ's contract bore Viljanen's signature.

22. PZ stated she was unaware Respondents had filed a claim on her behalf, and ultimately withdrew the claim.

OG

23. Respondents identified the representative who contracted with Oregon Client

[1] Respondents filed the claim approximately eight months after the wildfire that purportedly damaged SJ's property.
[2] SJ's property was located approximately 135 miles from the wildfire at issue.
[3] The inspector for SJ's claim reviewed Bryant's digital business card and denied it was the representative who identified himself as Madrid, suggesting a number of Respondents' representatives falsely identified themselves as Madrid.

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"OG" as "Alex Lopez" ("Lopez"). OG's contract bore Viljanen's signature.[4]

JRA

24. Respondents identified the representative who contracted with Oregon Client "JRA" as Lopez. JRA's contract bore Viljanen's signature.[5]

VD

25. Respondents identified the representative who contracted with Oregon Client "VD" as Delgadillo. VD's contract bore Viljanen's signature.

26. VD denied that her property had been damaged and stated she was unaware that Respondents had filed a claim on her behalf. She ultimately withdrew the claim.

LK

27. Respondents identified the representative who contracted with Oregon Client "LK" as Delgadillo. LK's contract bore Viljanen's signature.

28. LK's insurance carrier inspected her property and found no damage. Respondents withdrew her claim.

JI

29. Respondents identified the representative who contracted with Oregon Client "JI" as Delgadillo. JI's contract bore Viljanen's signature.

30. JI's insurance carrier inspected her property, found no damage and denied her claim.

RR

31. Respondents identified the representative who contracted with Oregon Client "RR" as Delgadillo. RR's contract bore Viljanen's signature.

32. RR denied that his property had been damaged and contacted his insurance carrier to withdraw his claim, stating that it had been filed fraudulently.

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[4] OG's claim was closed when the insurance carrier was unable to make contact with him.
[5] JRA's claim was closed when the insurance carrier was unable to make contact with him.

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BY

33. Respondents identified the representative who contracted with Oregon Client "BY" as Delgadillo. BY's contract bore Viljanen's signature.

34. BY denied that his property had been damaged and Respondents ultimately withdrew his claim.

BB

35. Respondents identified the representative who contracted with Oregon Client "BB" as Lopez. BB's contract bore Viljanen's signature.

36. Respondents withdrew BB's claim after her insurance carrier requested an Examination Under Oath.[6]

DH

37. Respondents identified the representative who contracted with Oregon Client "DH" as "Gerardo Jimenez." DH's contract bore Viljanen's signature.

38. Respondents withdrew DH's claim after his insurance carrier requested an Examination Under Oath.

TK

39. Respondents identified the representative who contracted with Oregon Client "TK" as Delgadillo. TK's contract bore Viljanen's signature.

40. Respondents withdrew TK's claim after his insurance carrier requested an Examination Under Oath.

JP

41. Respondents identified the representative who contracted with Oregon Client "JP" as Delgadillo. JP's contract bore Viljanen's signature.

42. Respondents withdrew JP's claim after his insurance carrier requested an Examination Under Oath.

[6] An Examination Under Oath is a sworn statement from the insured regarding their claim.

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GP

43. Respondents identified the representative who contracted with Oregon Client "GP" as Delgadillo. GP's contract bore Viljanen's signature.

44. Respondents withdrew GP's claim after her insurance carrier requested an Examination Under Oath.

DS

45. Respondents identified the representative who contracted with Oregon Client "DS" as Delgadillo. DS's contract bore Viljanen's signature.

46. Respondents withdrew DS's claim after his insurance carrier requested an Examination Under Oath.

CONCLUSIONS OF LAW

The Director CONCLUDES that:

47. By contracting with the Oregon Clients and filing insurance claims on their behalf, Respondents acted as "adjusters," as defined under ORS 744.502(1).

48. By failing to promptly reply to the Director's inquiries in a timely fashion, as set forth in Paragraphs (7) – (11), Viljanen violated ORS 731.296.

49. By committing the foregoing violation of ORS 731.296, Viljanen violated ORS 744.584(1)(o).

50. By engaging in the conduct set forth in Paragraphs (12) – (46), Respondents violated ORS 744.584(1)(a) in 17 instances.

51. By engaging in the conduct set forth in Paragraphs (12) – (46), Respondents violated ORS 744.584(1)(f) in 17 instances.

52. Because Viljanen engaged in the foregoing violations of ORS 744.584(1)(a), (f), and (o), the Director may revoke his insurance adjuster license, under ORS 744.584(2)(a)(B).

53. Because the Director has reason to believe that Respondents have been engaged

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in violations of the Insurance Code, the Director may issue an order to Respondents to cease and desist, under ORS 731.252(1).

54. The Director may impose a civil penalty of up $10,000 *per violation* upon any person who violates a provision of the Insurance Code, under ORS 731.988(1). The civil penalty for individual insurance adjusters may not exceed $1,000 for each offense.

ORDERS

The Director issues the following ORDERS:

55. As authorized by ORS 731.252(1), the Director ORDERS Respondents to CEASE AND DESIST from violating ORS 744.584(1)(a) and (f).

56. As authorized by ORS 731.252(1), the Director ORDERS Viljanen to CEASE AND DESIST from violating ORS 731.296 and ORS 744.584(1)(o).

57. As authorized by ORS 731.988(1), the Director ORDERS that Respondents be jointly and severally subject to a CIVIL PENALTY of $60,000 for violating ORS 744.584(1)(a) and (f).

58. As authorized by ORS 731.988(1), the Director ORDERS that Viljanen be subject to a CIVIL PENALTY of $1,000 for violating ORS 731.296.

59. The Director hereby suspends payment of $51,000 of the CIVIL PENALTY assessed in Paragraph (57) for a period of three years, provided Respondents comply with the terms of this Order.

60. The non-suspended CIVIL PENALTIES assessed in Paragraph (57) ($9,000) and Paragraph (58) ($1,000) are due and payable on the following terms:

A. $1,000 at the time Respondents return this signed Order to the Director;

B. $1,000 on May 1, 2026; and

C. $1,000 on the first business day of each of the subsequent eight months.

61. As authorized by ORS 744.584(2)(a)(B) and ORS 744.584(1)(a), (f), and (o), the Director hereby REVOKES Viljanen's insurance adjuster license.

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62. Respondents hereby agree to PERMANENTLY REFRAIN from any and all attempts to seek licensure under the Oregon Insurance Code. This extends to any and all entities for whom Viljanen is a partner, member, manager, officer or director, occupies a similar status, performs similar functions and/or exercises management or control.

63. Respondents' failure to satisfy any term(s) of this Order will render all suspended and non-suspended penalties immediately due and owing.

64. This Order is binding upon Respondents' successors and assigns.

SO ORDERED this 6th day of April, 2026.

SEAN E. O'DAY, Director
Department of Consumer and Business Services

/s/ Dorothy Bean
Dorothy Bean, Chief of Enforcement
Division of Financial Regulation

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CONSENT TO ENTRY OF ORDER

I, Anssi Viljanen, state that I am an officer of Ironside and I am authorized to act on its behalf. I have read the foregoing Consent Order, and I know and fully understand the contents hereof. I have been advised of the right to a hearing and of the right to be represented by counsel in this matter. Without admitting or denying the Director's Findings of Fact or Conclusions of Law, Ironside voluntarily and without any force or duress consents to the entry of this Consent Order expressly waiving any right to a hearing in this matter in this jurisdiction. Ironside understands that the Director reserves the right to take further actions to enforce this Consent Order or to take appropriate action upon discovery of other violations of the Insurance Code. Ironside will fully comply with the terms and conditions stated herein.

Ironside understands that this Consent Order is a public document.

Signature: /s/ Anssi Viljanen

Position Held: President

State of California

County of Los Angeles

Signed or attested before me on this 2nd day of April, 2026

by Anssi Viljanen.

/s/ Peter Wisuthsuraphol
Notary Public

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CONSENT TO ENTRY OF ORDER

I, Anssi Viljanen, have read the foregoing Consent Order, and I know and fully understand the contents hereof. I have been advised of my right to a hearing and of the right to be represented by counsel in this matter. Without admitting or denying the Director's Findings of Fact or Conclusions of Law, I voluntarily and without any force or duress consent to the entry of this Consent Order expressly waiving any right to a hearing in this matter in this jurisdiction. I understand that the Director reserves the right to take further actions to enforce this Consent Order or to take appropriate action upon discovery of other violations of the Insurance Code. I will fully comply with the terms and conditions stated herein.

I understand that this Consent Order is a public document.

Signature: /s/ Anssi Viljanen

State of California

County of Los Angeles

Signed or attested before me on this 2nd day of April, 2026

by Anssi Viljanen.

/s/ Peter Wisuthsuraphol
Notary Public

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